REMARKS

By this Amendment, Applicant has amended claims 1, 2, and 4-7. Claims 1-12 remain pending.

In the last Office Action, the Examiner rejected claims 1-12 under 35 U.S.C. § 103(a) as unpatentable over U.S. 6,233,341 ("*Riggins*") and U.S. Patent No. 6,631,427 ("*Kubo*").

Applicant requests withdrawal of the rejection because a *prima facie* case of obviousness has not been established for the claims.

To establish *prima facie* obviousness under 35 U.S.C. § 103(a), three requirements must be met. First, the applied references, taken alone or in combination, must teach or suggest each and every element recited in the claims. *See* M.P.E.P. § 2143.03. Second, there must be some suggestion or motivation, either in the reference(s) or in the knowledge generally available to one of ordinary skill in the art, to combine or modify the reference(s) in a manner resulting in the claimed invention. Third, a reasonable expectation of success must exist. Moreover, each of these requirements must "be found in the prior art, and not be based on applicant's disclosure." M.P.E.P. § 2143.

CLAIMS 1-6

For claim 1, neither *Riggins* nor *Kubo* teaches or suggests, separately or in combination, an electronic apparatus comprising at least (1) a revocation list acquiring unit configured to acquire, via a first interface configured to interface a data processing unit with a recording medium of a first media type, first revocation list information recorded on the recording medium of the first media type by using a first device driver,

and (2) a revocation list recording unit configured to record, via a second interface configured to interface the data processing unit with a recording medium of a second media type, the first revocation list information on the recording medium of the second media type by using a second device driver, such that the recorded first revocation list information is used in authentication between the electronic apparatus and the recording medium of the second media type, as recited in amended claim 1.

In contrast, *Riggins* merely discloses a website 130 that is contacted by a client 125 using a temporary certificate 400, and that asks a web server engine 303 to download a certificate revocation list 335. *Riggins*, col. 11, lines 14-16. *Kubo* merely discloses a control unit that invalidates read-out information for a device when a device cover is open or a power voltage is equal to or less than a predetermined value during battery operation. *Kubo*, Abstract.

On page 3 of the Office Action, the Examiner alleges that *Riggins* discloses a "certificate revocation list may be stored in the database of users 310, as shown in Figure 3, wherein the database could be an external storage device." This is not true. *Riggins* merely states that "security information, including identification and authentication information, distinguished name and usage log for each privileged user, is contained in the database of users 310." *Riggins*, col. 8, line 64 to col. 9, line 1.

Further, on pages 2 and 3 of the Office Action, the Examiner appears to indicate that *Riggins* teaches or suggest "a recording medium of a first media type detachably connected to an electronic apparatus" and "a recording medium of a second media type," but the Examiner fails to identify which elements in *Riggins* teach or suggest "a recording medium of a first media type detachably connected to the electronic

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apparatus" and "a recording medium of a second media type," as recited in claim 1. The Office Action also fails to show how *Riggins* or *Kubo* teaches or suggests recorded first revocation list information, acquired from the recording medium of the first media type detachably connected to the electronic apparatus, is used in authentication between the electronic apparatus and the recording medium of the second media type, as recited in claim 1.

Hence, *Riggins* and *Kubo* do not teach or suggest at least (1) a revocation list acquiring unit configured to acquire, via a first interface configured to interface a data processing unit with a recording medium of a first media type, first revocation list information recorded on the recording medium of the first media type, and (2) a revocation list recording unit configured to record, via a second interface configured to interface the data processing unit with a recording medium of a second media type, the first revocation list information on the recording medium of the second media type by using a second device driver, such that the recorded first revocation list information is used in authentication between the electronic apparatus and the recording medium of the second media type, as recited in amended claim 1.

Accordingly, the rejection of claim 1 should be withdrawn because a *prima facie* case of obviousness has not been established for claim 1.

For dependent claims 2-6, the rejection of these claims should be withdrawn at least by virtue of their dependence upon allowable claim 1, in addition to the patentable subject matter recited therein.

CLAIMS 7-12

For claim 7, neither *Riggins* nor *Kubo* teaches or suggests, separately or in combination, a content protecting method applied to an electronic apparatus having a data processing unit capable of reading/writing data from/to a recording medium of a first media type detachably connected to the electronic apparatus and a recording medium of a second media type, such that the method includes (1) loading, via a first interface, first revocation list information recorded on the recording medium of the first media type by using a first device driver which controls the recording medium of the first media type, (2) recording, via a second interface, the loaded first revocation list information on the recording medium of the second media type by using a second device driver which controls the recording medium of the second media type, and (3) using the recorded first revocation list information in authentication between an electronic apparatus and the recording medium of the second media type.

In contrast and as discussed above, *Riggins* merely discloses a website 130 that is contacted by a client 125 using a temporary certificate 400, and that asks a web server engine 303 to download a certificate revocation list 335. *Riggins*, col. 11, lines 14-16. *Kubo* merely discloses a control unit that invalidates read-out information for a device when a device cover is open or a power voltage is equal to or less than a predetermined value during battery operation. *Kubo*, Abstract. This is not the same and does not suggest at least loading a first revocation list information recorded on a recording medium of a first media type detachably connected to an electronic apparatus, recording the loaded first revocation list information on a recording medium of a second media type, and using the recorded first revocation list information in

authentication between the electronic apparatus and the recording medium of the second media type.

Accordingly, the rejection of claim 7 should be withdrawn because a *prima facie* case of obviousness has not been established for claim 7.

For dependent claims 8-12, the rejection of these claims should be withdrawn at least by virtue of their dependence upon allowable claim 7, in addition to the patentable subject matter recited therein.

CONCLUSION

Applicant respectfully requests reconsideration of this application and the timely allowance of the pending claims.
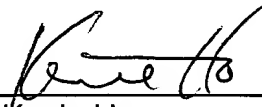
Applicant notes that the Office Action contains numerous statements reflecting apparent assertions concerning the related art and claims. Regardless of whether any such statement is addressed specifically herein, Applicant declines to automatically subscribe to any assertion and/or characterization set forth in the Office Action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: July 25, 2005

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